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October 25, 2023

**VIA ECF**

Honorable Judge Arun Subramanian  
United States District Court  
500 Pearl Street, Courtroom 15 A  
New York, NY 10007

**Re: Gonzalez v. Stone Tech Industries LLC, et al.**  
**SDNY Case No.: 1:23-cv-03781**

Dear Judge Subramanian:

This office represents the Plaintiffs, Adrian Gonzalez, Andres Guzman, Juan Lituma and Ubaldo Garcia in the above-captioned case.

Plaintiffs' time to move for final default judgment against Defendants, Stone Tech Industries, LLC, and Salih Ozen expires October 25, 2023. Counsel for Plaintiffs have not heard anything from the Defendants and fully intend to move forward with the final default judgment. At this time, counsel requires additional time to speak with all of the plaintiffs in order to gather supplemental information as may be required for the motion for final default judgment. As such, Plaintiffs respectfully request that Your Honor grant an extension of time through to November 24, 2023, for the Plaintiffs to move for final default judgment against both Defendants. This is the third request of this type and no other dates will be affected by this request.

We thank the Court for your time and consideration in this matter.

Respectfully Submitted,

**Law Offices of Nolan Klein, P.A.**

By: /s/ Nolan Klein  
NOLAN KLEIN, ESQ.

NKK/amd  
cc: Erik M. Bashian, Esq.

Plaintiffs' request is GRANTED. Plaintiffs may move for default judgment no later than **November 27, 2023**. The Clerk of Court is directed to terminate the motion at ECF No. 25.

SO ORDERED.



Arun Subramanian, U.S.D.J.  
Date: October 25, 2023